

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :  
- v. - :  
MIAN M. SHAHID, :  
Defendant. :  
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INFORMATION

S1 07 Cr. 489 (CM)

COUNT ONE

(Wire Fraud)

The United States Attorney charges:

1. On or about January 17, 2007, in the Southern District of New York and elsewhere, MIAN M. SHAHID, the defendant, unlawfully, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, did transmit and cause to be transmitted, by means of wire communication in interstate commerce, writings, signs and signals for the purpose of executing such scheme and artifice, to wit, SHAHID caused another to apply for a credit line at a store under a false identity, which credit application required the transmission of false information by means of wire communication and resulted in the granting of an unauthorized line of credit.

(Title 18, United States Code, Sections 1343 and 2.)

**COUNT TWO**

(Access Device Fraud)

The United States Attorney further charges:

2. From on or about January 24, 2007, up to and including on or about February 12, 2007, in the Southern District of New York and elsewhere, MIAN M. SHAHID, the defendant, unlawfully, willfully and knowingly, and with intent to defraud, in an offense affecting interstate commerce, did traffic in and use one and more unauthorized access devices during a one-year period, and by such conduct did obtain things of value aggregating \$1,000 and more during that period, to wit, SHAHID used, and caused another to use, without authorization, credit cards to obtain merchandise and services worth more than \$1,000.

(Title 18, United States Code, Sections 1029(a)(2) and 2.)

**COUNT THREE**

(Identity Fraud)

The United States Attorney further charges:

3. From at least in or about November 2006, up to and including at least in or about February 2007, in the Southern District of New York and elsewhere, MIAN M. SHAHID, the defendant, unlawfully, willfully, and knowingly, did transfer an identification document, authentication feature, and a false identification document knowing that such document and feature was stolen and produced without lawful authority, and thereby did

affect interstate commerce, to wit, SHAHID used, and caused another to use, without authorization, a New York State Identification Card to engage in fraudulent activity.

(Title 18, United States Code, Sections 1028(a)(2) and 2.)

**COUNT FOUR**

(Bank Fraud)

The United States Attorney further charges:

4. From in or about 2006, up to and including in or about April 2007, in the Southern District of New York and elsewhere, MIAN M. SHAHID, the defendant, unlawfully, willfully and knowingly, did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, SHAHID opened and used, and caused another to open and use, bank

accounts using fraudulent identification documents, at banks located in the New York metropolitan area.

(Title 18, United States Code, Sections 1344 and 2.)

**FORFEITURE ALLEGATION**

(As to Count One)

5. As a result of committing the wire fraud offense alleged in Count One of this Information, MIAN M. SHAHID, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense, including but not limited to at least \$478,676.65 in United States currency, representing the amount of proceeds that the defendant obtained as a result of the offense.

**Substitute Asset Provision**

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981 and Title 28, United States Code, Section 2461)

**FORFEITURE ALLEGATION**

(As to Counts Two, Three, and Four)

7. As a result of committing the identification fraud and bank fraud offenses alleged in Counts Two, Three and Four of this Information, MIAN M. SHAHID, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 982, any property constituting, or derived from, proceeds obtained directly or indirectly as a result of said offenses, including but not limited to at least \$478,676.65 in United States currency, representing the amount of proceeds the defendant obtained as a result of the offenses.

**Substitute Asset Provision**

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;

(3) has been placed beyond the jurisdiction of the Court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;  
it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982, 1028, 1029, and 1344.)

  
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MICHAEL J. GARCIA  
United States Attorney

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SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

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MIAN M. SHAHID,

Defendant.

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(18 U.S.C. §§ 1028(a)(2), 1029(a)(2),  
1343, 1344, and 2)

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MICHAEL J. GARCIA  
United States Attorney.

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